

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

	)	
IN RE: NEW ENGLAND	)	
COMPOUNDING PHARMACY, INC.	)	1:13-md-02419-FDS
PRODUCTS LIABILITY LITIGATION	)	
	)	
This Document Relates To:	)	
	)	
JOAN HULSEY AND GUY HULSEY	)	
	)	
Plaintiffs.	)	
	)	
v.	)	1:13-cv-12961-FDS
	)	
MARION PAIN MANAGEMENT	)	
CENTER, INC., MANGALA J.	)	
SHETTY, MD,	)	
	)	
Defendants.	)	
	)	
	)	

**DEFENDANTS, MARION PAIN MANAGEMENT CENTER, INC. AND  
MANGALA J. SHETTY, M.D.'S ASSENTED TO MOTION FOR LEAVE TO  
FILE MEMORANDUM OF LAW IN EXCESS OF PAGE LIMIT**

Defendants, Marion Pain Management Center, Inc. (“Marion”) and Mangala J. Shetty, M.D. (“Dr. Shetty”) hereby moves this Honorable Court for leave to file a Memorandum of Law in excess of page limit in support of its Motion to Dismiss Plaintiffs' Corrected Short Form Complaint against Unaffiliated Defendants (Dkt. #637 on the Master Docket and Dkt. #12 on the Halsey Docket). On February 12, 2014, Marion and Dr. Shetty filed a Motion for Extension of Time to File an Answer or Other Responsive Pleading with the assent of Plaintiff’s counsel (Dkt. #912). On February 18, 2014, the Honorable Rya W. Zobel granted this Motion giving Marion and Dr. Shetty until March 12, 2014 to file a responsive pleading. Marion and Dr. Shetty plan

to file a Motion to Dismiss the Plaintiffs' Corrected Short Form Complaint and Memorandum of Law in Support, but anticipate that the Memorandum will exceed the twenty (20) page limit identified in Local Rule 7.1(B)(4).

Marion and Dr. Shetty request leave of Court to exceed the page limit set forth in Local Rule 7.1(B)(4). More than twenty (20) pages will be needed to effectively outline Marion and Dr. Shetty's positions in their Memorandum of Law. Counsel for the Plaintiffs have assented to this Motion.

For the foregoing reasons, Marion and Dr. Shetty respectfully request that the Court waive the twenty (20) page limit for their Memorandum of Law in Support of their Motion to Dismiss.

Dated: March 10, 2014

Respectfully Submitted,

The Defendants,  
MARION PAIN MANAGEMENT  
CENTER, INC. and  
MANGALA J. SHETTY, M.D.  
By their Attorneys

/s/ Robert L. Boston  
James M. Campbell (BBO#541882)  
David M. Rogers (BBO#542233)  
Robert L. Boston (BBO# 665174)  
Campbell Campbell Edwards & Conroy,  
Professional Corporation  
One Constitution Center  
Boston, MA 02129  
(617) 241-3000  
[jmcampbell@campbell-trial-lawyers.com](mailto:jmcampbell@campbell-trial-lawyers.com)  
[drogers@campbell-trial-lawyers.com](mailto:drogers@campbell-trial-lawyers.com)  
[rboston@campbell-trial-lawyers.com](mailto:rboston@campbell-trial-lawyers.com)

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 10th day of March, 2014, a copy of the foregoing document was filed electronically with the United States District Court for the District of Massachusetts, which will send notification of such filing to all counsel of record:

Joshua R. Gale  
Wiggins, Childs, Quinn & Pantazis, LLC  
101 N. Woodland Blvd., Suite 600  
Deland, FL 32720

Craig L. Lowell  
*Pro Hac Vice Admission*  
Wiggins, Childs, Quinn & Pantazis, LLC  
The Kress Building  
301 19<sup>th</sup> Street North  
Birmingham, AL 35203

/s/ Robert L. Boston

Robert L. Boston